Case 1:07 or 00238-00-12 Deacment 1

Deadment 1 Filed 04/24/2007

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

CARMEN YOUNGS, GREGORY YOUNGS,

Defendants.

USDC SDNY
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DOC #: _____APR 2 4 2007

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INDICTMENT

OFCRIM

338

COUNT ONE

The Grand Jury charges:

From in or about June 2000, through in or about March 2007, in the Southern District of New York and elsewhere, CARMEN YOUNGS and GREGORY YOUNGS, the defendants, unlawfully, willfully and knowingly, did embezzle, steal, purloin, and convert to their own use, money and things of value of the United States and a department and agency thereof, to wit, the United States

Department of Housing and Urban Development, and did receive, conceal, and retain the same with intent to convert it to their own use and gain, knowing it to have been embezzled, stolen, purloined and converted, the value of which exceeded \$1,000, to wit, CARMEN YOUNGS AND GREGORY YOUNGS received approximately \$61,112.73 in federal housing subsidies, to which they were not entitled, through fraud and deceit.

(Title 18, United States Code, Sections 641 and 2.)

Pace Tamarchia Vasio I

MICHAEL J. GARCIA

United States Attorney

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

CARMEN YOUNGS AND GREGORY YOUNGS, Defendants.

INDICTMENT

07 Cr.

(18 U.S.C. §§ 641 and 2)

MICHAEL J. GARCIA United States Attorney.

Post11-1-87 4/24/07 Filed Ind. Ells, J.